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AUSA Kim West
United States Attorney's Office
United States Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210

Re: U.S. v. Mohamed Hamade
Case No. 1:04-cr-10214-GAO

Dear Ms. West:

I am writing to notify you that, in connection with his trial, my client, Mohamed Hamade, reasonably expects, in light of the information elicited by the government in the first trial, to disclose or cause to be disclosed information regarding the JTTF's or other federal law enforcement agency's investigation of Mr. Hamade as a suspected terrorist or someone suspected of having links to terrorist activity. Such information would include communications and reports created and filed in the course of the JTTF's or other agency's inquiry, as well as findings and conclusions.

It was evident at his first trial that Mr. Hamade was targeted by ICE. The jury was undoubtedly left with the unfair and highly prejudicial suggestion that he was suspected of unlawful conduct, wholly unrelated to an understandable desire to marry and reside in the United States. Since, after years of scrutiny and investigation, the government has chosen not to prosecute or detain Mr. Hamade for anything other than the present charges before the court, the logical conclusion is that the information provided to the JTTF and other agencies suggesting that Mr. Hamade was linked to terrorism proved to be unfounded. Accordingly, in order to assure Mr. Hamade a fair trial, free of innuendo and a transparently secret government agenda, the defendant may be required to disclose or cause to be disclosed classified information, rebutting any intimation that he is or was linked to terrorism.

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